

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA  
*ex rel.* BEAU MICHAUD,

Plaintiff,

v.

NORTHROP GRUMMAN SYSTEMS CORP.,  
*et al.*,

Defendants.

Civil No. 1:11CV606 (TSE) (TRJ)

**STIPULATION OF DISMISSAL OF RELATOR'S CLAIMS AGAINST  
DEFENDANT MOTOR DRIVES AND CONTROLS, INC. WITH PREJUDICE**

Relator Beau Michaud, by his undersigned counsel, files this stipulation of dismissal, signed by all parties who have appeared, to dismiss all of Relator's claims against Defendant Motor Drives and Controls, Inc. ("MDCI") only, with prejudice (but without prejudice to the rights of the United States), pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). MDCI has agreed that, in exchange for Relator's voluntary dismissal, MDCI will not file a bill of costs.

The parties sought the consent of the United States for this dismissal and the United States will indicate its consent in a separate filing.

Respectfully submitted,

/s/David L. Scher

David L. Scher, VA Bar No. 47634  
R. Scott Oswald, VA Bar No. 41770  
The Employment Law Group, P.C.  
888 17<sup>th</sup> Street, NW, 9<sup>th</sup> Floor  
Washington, D.C. 20006  
(202) 261-2803

(202) 261-2835 (facsimile)  
[dscher@employmentlawgroup.com](mailto:dscher@employmentlawgroup.com)  
[soswald@employmentlawgroup.com](mailto:soswald@employmentlawgroup.com)  
*Counsel for Plaintiff Beau Michaud*



John W. Chierichella (*Pro Hac Vice*)  
Anne B. Perry (*Pro Hac Vice*)  
David S. Gallacher (VSB # 46875)  
Christopher L. Loveland (*Pro Hac Vice*)  
Townsend L. Bourne (VSB # 78304)  
SHEPPARD MULLIN RICHTER &  
HAMPTON LLP  
1300 I Street, NW, 11<sup>th</sup> Fl., East  
Washington, DC 20005-3314  
Tel: (202) 218-0033  
Fax: (202) 312-9406  
Email: [dgallacher@sheppardmullin.com](mailto:dgallacher@sheppardmullin.com)

*Attorneys for Northrop Grumman Systems  
Corporation*



John S. Vento (*Pro Hac Vice*)  
Mark D. Kiser (*Pro Hac Vice*)  
TRENAM KEMKER  
101 E. Kennedy Boulevard, Suite 2700  
Tampa, FL 33602-5150  
Tel: 813-223-7474  
Fax: 813-229-6553

Jason C. Lynch (VSB # 84134)  
Andy Liu (*Pro Hac Vice*)  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2595  
Tel: (202) 624-2500  
Fax: (202) 628-5116  
Email: [dobrien@crowell.com](mailto:dobrien@crowell.com)

*Attorneys for Defendant Motor Drives &  
Controls, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of June, 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

John W. Chierichella (*Pro Hac Vice*)  
Anne B. Perry (*Pro Hac Vice*)  
David S. Gallacher (VSB # 46875)  
Christopher L. Loveland (*Pro Hac Vice*)  
Townsend L. Bourne (VSB # 78304)  
SHEPPARD MULLIN RICHTER &  
HAMPTON LLP  
1300 I Street, NW, 11<sup>th</sup> Fl., East  
Washington, DC 20005-3314  
Tel: (202) 218-0033  
Fax: (202) 312-9406  
Email: dgallacher@sheppardmullin.com

Jason C. Lynch (VSB # 84134)  
Andy Liu (*Pro Hac Vice*)  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2595  
Tel: (202) 624-2500  
Fax: (202) 628-5116  
Email: dobrien@crowell.com

John S. Vento (*Pro Hac Vice*)  
Mark D. Kiser (*Pro Hac Vice*)  
TRENAM KEMKER  
101 E. Kennedy Boulevard, Suite 2700  
Tampa, FL 33602-5150  
Tel: 813-223-7474  
Fax: 813-229-6553

***Attorneys for Northrop Grumman Systems  
Corporation***

***Attorneys for Defendant Motor Drives &  
Controls, Inc.***

I also hereby certify that on this the 26th day of June, 2014, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of electronic filing to above counsel as well as the following non-filing users:

Peter S. Hyun, Esq.  
Assistant U.S. Attorney  
U.S. Attorneys' Office  
2100 Jamieson Avenue

Alexandria, VA 22314

*Counsel for the United States*

/s/ David L. Scher